

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	Case No. 20-10049-TPA
)	Chapter 11
TRI-STATE PAIN INSTITUTE, LLC,)	
Debtor)	Related to Doc. No.642

In re:)	Case No. 20-10334-TPA
)	Chapter 11
JOSEPH M. THOMAS, M.D.,)	
Debtor)	Related to Doc. No.470

In re:)	Case No. 21-10118-TPA
)	Chapter 11
2374 VILLAGE COMMON DRIVE, LLC,)	
Debtor)	Related to Doc. No.159

REPORT ON STATUS NEGOTIATIONS WITH WELLS FARGO
PURSUANT TO ORDER DATED JUNE 30, 2021

AND NOW, comes the Official Creditors' Committee for Tri-State Pain Institute, LLC ("Committee"), by and through the Committee's counsel, Knox McLaughlin Gornall & Sennett, P.C., together with the Debtors, by and through their counsel, Gary V. Skiba, Esquire on behalf of Tri-State Pain Institute, LLC ("Tri-State") and Michael P. Kruszewski, Esquire on behalf of Joseph M. Thomas ("Dr. Thomas") and 2374 Village Common Drive, LLC ("VCD"), with this Report pursuant to Order dated June 30, 2021, as follows:

1. Counsel for all parties have conferred in good faith for purposes of reaching an agreement regarding the secured status of Wells Fargo following the sale of the 2374 Village

Common Drive property and the extent and value of the remaining Debtor assets in which Wells Fargo holds a valid security interest.

2. Specifically, Attorneys Skiba, Kruszewski, Eiben, Mulryan and Fustine met on July 1, 2021. On July 6, 2021, Attorneys Skiba, Kruszewski, Mulryan and Fustine met with Attorneys Salene Kraemer and Harry Greenfield on behalf of the Bank. On July 7, 2021, Attorneys Skiba, Kruszewski, Mulryan and Fustine had a follow-up meeting and on July 8, 2021, Attorneys Skiba, Kruszewski, Mulryan and Fustine met again with Attorneys Kraemer and Greenfield.

3. At that point it was decided that Attorneys Fustine and Greenfield would try to finalize the negotiations.

4. On July 13, 2021, Attorney Fustine had a telephone conference with Attorney Harry Greenfield and followed-up with an email on the same day at 1:06 p.m., establishing the agreed-to framework for settlement including fourteen (14) points, twelve (12) of which have been tentatively agreed-to.

5. Attorneys Fustine, Kruszewski, Skiba and Greenfield have spoken several times in the meantime. However, there has been no official response from the Bank to Fustine's email and negotiated counter-proposal dated July 13, 2021.

6. The issues in dispute have been narrowed down considerably and the parties are very close to an agreement which would then require Court approval.

7. There are only two minor points which have not been resolved. The ball is in the Bank's court and Tri-State, Dr. Thomas, VCD and the Committee remain poised to finalize an agreement as soon as possible.

Respectfully submitted,

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Attorneys for Official Creditors' Committee for
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